


# IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

## Report Of Investigation

Page \_\_\_\_ Of \_\_\_\_

<b>INVESTIGATION DATE</b>		<b>FROM:</b> (Use Stamp) <div style="text-align: center; margin-top: 10px;">             IOWA DEPT. OF ENVIRONMENTAL QUALITY              REGIONAL OFFICE #4              ATLANTIC, IOWA 51502              PHONE 712/243-1031         </div>
Current 11-4-81	Last -	
<b>TO: (Facility Name, Location &amp; Address)</b> Chevron Chemical Company P. O. Box 559 Council Bluffs, Iowa 51501 IAD #000651026		
<b>RE: (Specify Investigation Purpose Or Cite Rule)</b> Hazardous Waste Generator Inspection		<b>Persons Contacted (Name &amp; Position)</b> Walter Johnson, Plant Manager
		 R00003211 RCRA Records Center

### OBSERVATIONS/RECOMMENDATIONS

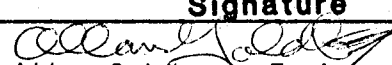
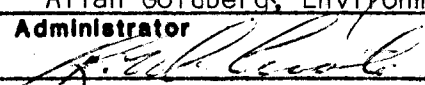
**GENERAL FACILITY REQUIREMENTS:** This facility manufactured and warehoused agricultural chemicals; however, Walter Johnson, plant manager, stated that Chevron Chemical in Council Bluffs is no longer involved in manufacturing and is scheduled to be completely shut down by March 1, 1982. Since this site does not store hazardous waste more than 90 days, a formal closure plan is not required. Nevertheless, the formulation of agricultural chemicals may leave toxic residues on the manufacturing machinery and other process units involved. It was recommended to Mr. Johnson that a formal written closure plan for the facility be submitted for review, and registered with this Department. A suitable solvent (methanol) should be used to rinse manufacturing/processing equipment and disposed of at a hazardous waste landfill, if necessary.

Presently, the storehouse is holding various finished agricultural chemicals, awaiting shipment. Mr. Johnson was requested to contact Regional Office #4 in Atlantic, Iowa when all farm chemicals are removed from the site, for a final inspection.

Mr. Johnson, plant manager, stated that he interpreted 40 C.F.R., Section 262.34, to mean that a generator's 90-day accumulation begins after accumulating 2200 pounds of hazardous waste. This is incorrect; Section 262.34(a) states: "The generator may accumulate hazardous waste on-site without a permit for 90 days or less." Mr. Johnson is reminded that Section 262.34(b) states: "A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 40 C.F.R., Sections 264 and 265, and the permit requirements of 40 C.F.R.122."

At the time of this inspection, 21 55-gallon drums of hazardous waste; parathion, aldrin, and methoxychlor, were awaiting shipment. Also, five pieces of equipment contaminated with heptachlor and aldrin are awaiting shipment to hazardous waste landfill.

In addition, Mr. Johnson has incorrectly labeled paraquat as a hazardous substance

SUSPENSE DATE	Signature	Date
11/1	<b>Inspector</b>  Allan Goldberg, Environmental Specialist	11-16-81
	<b>Regional Administrator</b> 	12-1-81
<b>Enclosures (Specify)</b>		
<b>Distribution: Regional Office: Central Office: Inspected Facility</b>		

# IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

SANITARY LANDFILL INSPECTION ☐

WATER SUPPLY INSPECTION ☐

WASTEWATER TREATMENT FACILITY INSPECTION ☐

AIR QUALITY INSPECTION ☐

HAZARDOUS WASTE INSPECTION ☒

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Facility/Permit # \_\_\_\_\_

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ITEM CODE	COMMENTS AND RECOMMENDATIONS
	<p>and not as a hazardous waste. The active ingredient of paraquat, dimethyl sulfate, is a listed hazardous constituent in 40 C.F.R., Section 261, Appendix VIII. Therefore, paraquat is a generated HW and must be handled and disposed of in accordance with 40 C.F.R., Section 262.</p> <p>Hazardous waste has been shipped to Chemical Waste Management, NIES Division, Wichita, Kansas, for ultimate disposal. Numerous administrative deficiencies exist which are discussed by line items as they are marked in the inspection checklist. Each of the items discussed is referenced to federal regulations (40 C.F.R.) which have been adopted by reference in Chapter 45, Iowa Administrative Code.</p>
1.	<p><u>Manifest</u> - The previous manifest on record from this facility lists the volume of the hazardous waste containers, but not the weight. The total quantity of each hazardous waste must be specified by specific units; that is, pounds (P), tons (T), kilograms (K), and metric tons (1000 Kg (M). The operator of this facility should refer to 40 C.F.R., Sections 262.21, 262.22, and 262.23.</p>
2.A.(1&2)	<p><u>Personnel Training - Position Descriptions and Training Records</u> - Since this facility is scheduled to be closed by March 1, 1982, and only one other man is working at the plant at the present time, the personnel training requirements may be waived. However, if this facility continues to manufacture and/or store agricultural chemicals, Chevron Chemical Company will be required to comply with 40 C.F.R., 265.16.</p>
2.B.(5)	<p><u>Preparedness and Prevention Procedures - Arrangements with Local Authorities</u> - No formal plan outlining arrangements with local authorities in conjunction with the preparedness and prevention plan has been developed at this hazardous waste treatment and storage facility. The owner/operator must make arrangements to familiarize the police, fire departments, and response teams with the layout of the facility, chemical properties of the hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes; also, arrangements to familiarize local</p>

# IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

SANITARY LANDFILL INSPECTION ☐

WATER SUPPLY INSPECTION ☐

WASTEWATER TREATMENT FACILITY INSPECTION ☐

AIR QUALITY INSPECTION ☐

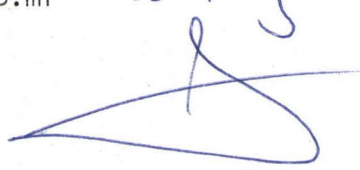
HAZARDOUS WASTE INSPECTION ☒

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Facility/Permit # \_\_\_\_\_

IAD 

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ITEM CODE	COMMENTS AND RECOMMENDATIONS
	hospitals of the chemical properties of the hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility. A formal written plan should be maintained at the site in compliance with 40 C.F.R., 265.52, as part of the contingency plan.
2.C.(1&2)	<u>Emergency Procedures - Contingency Plan</u> - This facility has a Spill Prevention Control and Counter measure (SPCC) plan on file. According to 40 C.F.R., Section 265.12(b), the owner or operator need only amend the SPCC plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this part. The plan, dealing with hazardous waste, must be expanded to: (1) describe the response actions of persons to fires, explosions, unplanned sudden or non-sudden release of hazardous waste; (2) describe arrangements to coordinate the emergency service with police and fire departments, hospitals and state and local emergency response teams; (3) identify emergency coordinators by name, address and telephone number at office and/or home; (4) specify emergency equipment as related to the needs of this facility; and, (5) develop an evacuation plan if deemed appropriate for this facility. The operators at Chevron Chemical Company should refer to 40 C.F.R., Section 265.52, as adopted in reference in 400 I.A.C. 45.6.
2.C.(2)	<u>Instruction on Contingency Plan</u> - No formal written documentation of instruction on contingency plan (training records) are maintained at this site. It is necessary to provide instruction on contingency plan for the appropriate persons.  12/2/81 Personnel Training requirement was waived by region yet insisted on compliance for contingency plan instruction requirements.  AG:mi 

Company Name Chevron Chemical Date of Inspection 11-4-81 IAD 

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HAZARDOUS WASTE GENERATOR  
General Administrative Requirements  
Site Inspection Report Checklist

INSTRUCTION  
Answer and Explain  
as Necessary

1. Manifest 140 CFR 262.21, 262.22 & 262.23 as Incorporated in 400-45 (455B) I.A.C.]

☐ Adequate ☒ More Effort Required ☐ Inadequate ☐ Not Applicable

2. Short Term Storage (262.34)

☒ Applicable ☐ Not Applicable

A. Personnel Training (265.16)

(1) Position Descriptions

(2) Training Records

☐ Adequate ☐ More Effort Required ☐ Inadequate

N/A

B. Preparedness and Prevention Procedures (265.30 & 265.31)

(1) Required Equipment (265.32) and (2) Testing and Maintenance of Equipment (265.33)

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

(3) Access to Communications or Alarm Systems (265.34) and (4) Required Aisle Space (265.35)

☒ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

(5) Arrangements with Local Authorities (265.37)

☐ Adequate ☒ More Effort Required ☐ Inadequate ☐ Not Applicable

C. Emergency Procedures (265.56)

(1) Contingency Plan (265.52) and (2) Instruction on Contingency Plan

☐ Adequate ☒ More Effort Required ☐ Inadequate

3. Recordkeeping (262.40) and Annual Report (262.41)

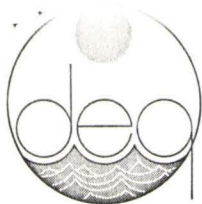
☐ Adequate ☐ More Effort Required ☐ Inadequate ☐ Not Applicable

*Still required*  
N/A

Company Name Chevron Chemical Date of Inspection 11-4-81 IAD 000651026

SHORT TERM STORAGE SITE INSPECTION REPORT CHECKLIST 4 (Containers)	INSTRUCTION Answer and Explain as Necessary
<p>A. Condition of Container (265.171)</p> <p><input checked="" type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate</p> <p>B. Inspections (265.174)</p> <p><input checked="" type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate</p> <p>C. Special Requirements for Ignitable or Reactive Waste (265.176)</p> <p><input checked="" type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate</p> <p>D. Labeling/Marking on Containers (262.31, 32, 34)</p> <p><input checked="" type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate</p>	

SHORT TERM STORAGE SITE INSPECTION REPORT CHECKLIST 5 (Tanks) N/A	INSTRUCTION Answer and Explain as Necessary
<p>A. Condition of Tanks (265.192)</p> <p><input type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate</p> <p>B. Uncovered Tank Requirement (265.192)</p> <p><input type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate <input type="checkbox"/> Not Applicable</p> <p>C. Tank with Continuous Feed Requirement (265.192)</p> <p><input type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate <input type="checkbox"/> Not Applicable</p> <p>D. Inspections</p> <p><input type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate</p> <p>E. Special Requirement for Ignitable or Reactive Waste</p> <p><input type="checkbox"/> Adequate <input type="checkbox"/> More Effort Required <input type="checkbox"/> Inadequate <input type="checkbox"/> Not Applicable</p>	



iowa department of environmental quality

reply to: Allan Goldberg, Regional Office #4  
phone: 712-243-1934

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SR

December 2, 1981

RECORD COPY  
File Name Chevron Chemical Co-Council Bluffs/HW Facilities  
Senders Initials [Signature]  
RECEIVED  
DEC 11 9 10 AM '81  
DEPARTMENT  
ENVIRONMENTAL QUALITY

Mr. Walter Johnson, Plant Manager  
Chevron Chemical Company  
P. O. Box 559  
Council Bluffs, Iowa 51501

RE: Hazardous Waste Inspection  
IAD 000651026

Dear Mr. Johnson:

Enclosed you will find a copy of the hazardous waste inspection report completed by this office. It is believed the report is self-explanatory. However, should you have any questions, do not hesitate to write or call.

Sincerely,

COMPLIANCE DIVISION

R. W. GROTE  
Regional Administrator  
Regional Office No. 4

RWG:mi

Enc.

cc: ✓ Jim Humeston, DEQ, Des Moines, Iowa

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